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Attorneys for Plaintiff
UNITED STATES OF AMERICA

UNITED STATES DISTRICT COURT

FOR THE CENTRAL DISTRICT OF CALIFORNIA

EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

JASON EDWARD THOMAS CARDIFF,

Defendant.

No. 5:23-CR-00021-JGB

**OPPOSITION TO JASON CARDIFF'S EX
PARTE REQUEST FOR MODIFICATION OF
REPORTING TIME**

Plaintiff United States of America, by and through its counsel
of record, the Consumer Protection Branch of the United States
Department of Justice and Trial Attorney Manu J. Sebastian, and the
United States Attorney for the Central District of California and

1 Assistant United States Attorney Valerie L. Makarewicz, oppose the Ex
2 Parte Request for Modification of Reporting Time to Allow Submission
3 of New Evidence made by Defendant, Jason Edward Thomas Cardiff.

4 Senior USPO Ryan McClellan confirmed to the undersigned today by
5 telephone that Defendant has not returned to the United States as the
6 Court ordered. Defendant's refusal to adhere to the Court's order is
7 further evidence that he is a flight risk, and the government
8 believes a bench warrant should be issued for Defendant's arrest.

9 Defendant claims that he has suffered from a medical condition
10 since at least 2016 which now makes him "unfit to fly." See Dkts.
11 162, 166. He has, however, taken at least 20 flights since his arrest
12 in November 2023. This includes two roundtrips to Kansas City, one
13 roundtrip to Las Vegas, two roundtrips to California for motion
14 hearings, two roundtrips to Ireland with layovers, and one one-way
15 trip to Ireland with a layover; all in just 12 months (Dkts. 32, 46,
16 80, 87, 103, and 122).

17 The government continues to question the veracity of the medical
18 records provided to the Court. Defendant's claim that the medical
19 "evidence is un rebutted" ignored the fact that Defendant's counsel
20 has repeatedly filed documentation under seal and in camera without
21 providing the government an opportunity to review the records, verify
22 their authenticity, and respond to the claims made therein. Dkt. 166
23 at 2:26-27. As previously asserted, the records presented to the
24 Court present a one-sided viewpoint, and Defendant has failed to
25 allege proper grounds for withholding the documentation from the
26 government.

27 The government requests the Court provide the government with
28 the ability to review the medical reports and underlying medical

1 records, and, if the Court is considering granting another extension
2 of the time Cardiff is permitted to remain in Ireland, schedule a
3 hearing for argument on the matter.

4 For the foregoing reasons, the government requests the Court
5 allow the government to verify the authenticity of the medical
6 documentation, deny the defendant's ex parte application, and issue a
7 bench warrant for Defendant's arrest.

8
9 Dated: January 21, 2025

Respectfully submitted,

10 AMANDA N. LISKAMM
11 Director
Consumer Protection Branch

12 JOSEPH T. MCNALLY
13 Acting United States Attorney

14 /s/
MANU J. SEBASTIAN
Trial Attorney
15 VALERIE L. MAKAREWICZ
Assistant United States Attorney

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17 Attorneys for the Plaintiff
United States of America
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